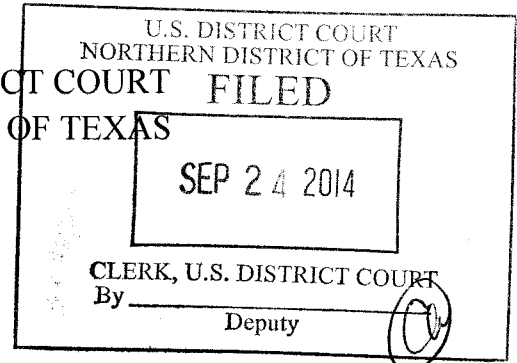


ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

NO.

RACHEL HARDY (1)

**3 - 14 CR - 373 - M**

INDICTMENT

The Grand Jury Charges:

Count One

Food Stamp Benefit Fraud  
(Violation of 7 U.S.C. § 2024(b))

Beginning in or around April 8, 2010, through July 31, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant, **Rachel Hardy**, did knowingly, use, transfer, acquire, alter and possess benefits of the Department of Agriculture Supplemental Food Stamp Program and its successor, the Nutrition Assistance Program (SNAP), a department and agency of the United States, based upon the submission of false and fraudulent information, and the nondisclosure of material facts, to wit: that **Rachel Hardy** failed to disclose her household composition and ownership of two businesses that generated income during the entire time period, and as a result she obtained benefits from the Department of Agriculture Food Stamp Program and its successor, SNAP, to which the defendant knew she was not entitled, having a value in excess of \$5,000.

In violation of 7 U.S.C. § 2024(b).

Count Two  
Theft of Federal Public Money  
(Violation of 18 U.S.C. § 641)

Beginning in or around April 8, 2010, and continuing through July 31, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant, **Rachel Hardy**, did knowingly embezzle, steal, and convert to her own use money and other things of value of the Social Security Administration (SSA), a department and agency of the United States, that is, defendant **Rachel Hardy**, based upon the submission of false and fraudulent information, and the nondisclosure of material facts to the Texas Department of Health and Human Services (TDHHS), the administrators of the Medicaid program, to wit: that **Rachel Hardy** failed to disclose her household composition and ownership of two businesses that generated income during the entire time period, and as a result she obtained Medicaid benefits to which the defendant knew she was not entitled, having a value in excess of \$1,000.00.

In violation of 18 U.S.C. § 641.

Count Three  
Theft of Educational Funds  
(Violation of 20 U.S.C. § 1097(a))

Beginning in or around June 28, 2010, and continuing through May 22, 2013, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Rachel Hardy**, did knowingly and willfully obtain by fraud and false statements, funds, assets, and property provided or insured under Title 20, Chapter 28, Subchapter IV of the United States Code, under the Federal Pell Grant Program and the William D. Ford Federal Direct Loan Program, administered by the Department of Education, a department and agency of the United States, and as a result she obtained funds to which the defendant, **Rachel Hardy** knew she was not eligible for, having a value in excess of \$200.

In violation of 20 U.S.C. § 1097(a).

Count Four  
Theft of Federal Public Money  
(Violation of 18 U.S.C. § 641)


Beginning in or around November 2, 2010, and continuing through December 14, 2011, in the Dallas Division of the Northern District of Texas and elsewhere, defendant, **Rachel Hardy**, did knowingly embezzle, steal, and convert to her own use money and other things of value belonging to the United States Department of Housing and Urban Development (HUD), a department and agency of the United States, based upon the submission of false and fraudulent information, and the nondisclosure of material facts to HUD, to wit: that **Rachel Hardy** failed to disclose her household composition and ownership of two businesses that generated income during the entire time period, and as a result she obtained housing subsidies to which the defendant knew she was not entitled, having a value in excess of \$1,000.00.

In violation of 18 U.S.C. § 641.

TRUE BILL

  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

RACHEL HARDY

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INDICTMENT

7 U.S.C. § 2024(b)  
Food Stamp Benefit Fund

18 U.S.C. § 641  
Theft of Federal Public Money

20 U.S.C. § 1097(a)  
Theft of Educational Funds

4 Counts

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A true bill rendered

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DALLAS

 FOREPERSON

Filed in open court this  day of September, 2014

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Custody status: Warrant to Issue

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UNITED STATES ~~DISTRICT~~ MAGISTRATE JUDGE  
No Criminal Complaint Pending

